

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

Douglas Bersaw

v.

Civil No. 15-cv-318-LM

Dynamic Recovery Solutions

O R D E R

The Preliminary Pretrial Conference was held on November 30, 2015. The plaintiff, proceeding pro se, attended the conference.

The defendant filed a proposed discovery plan. The Discovery Plan (document no. 7) is approved as submitted, with the following changes:

- Completion of Discovery deadline - September 12, 2016
- Motions to Dismiss - February 26, 2016

Mediation. The parties shall notify the court on or before July 15, 2016, if they wish to schedule a mediation.

Stipulation regarding privilege. The section in the discovery plan titled "Stipulation Regarding Claims of Privilege/Protection of Trial Preparation Materials (Fed. R. Civ. P. 26(f))" shall read as follows: "The parties shall comply with Rule 26(b)(5) with respect to claims of privilege,

privilege logs, protection of trial preparation materials and inadvertent disclosures. If privileged or trial preparation materials are inadvertently disclosed, the provisions of Fed. R. Civ. P. 26(b)(5) shall apply."

Completion of discovery. The parties are advised that the court considers the deadline for the completion of discovery to be a deadline by which discovery is to be completed - not a deadline by which discovery is to be served. Propounding parties shall ensure that enough time remains in the discovery period for the recipient to provide its responses by that deadline. Where Federal Rule 33(b)(2), 34(b)(2), or 36(a)(3) would call for a response after the deadline, the recipient need not provide a response.

Discovery Status Conference. The parties shall notify the court if they wish to schedule a status conference in this case prior to the close of discovery.

The key deadlines in the discovery plan are summarized in the chart below.

| Scheduling Designation | Deadline |
|---------------------------------|--------------------------------------|
| Trial Estimate (number of days) | 2 |
| Trial Date | Period beginning on November 8, 2016 |

| | |
|---|---|
| Completion of Discovery | September 12, 2016 |
| Interrogatories | A maximum of 25 interrogatories by each party to any other party. |
| Requests for Admission | A maximum of 50 requests for admission by each party to any other party. |
| Depositions | A maximum number of 10 depositions by plaintiff and 10 by defendant. Each deposition limited to a maximum of 7 hours. |
| Disclosure of Claims Against Unnamed Parties | December 31, 2015 |
| Joinder of Additional Parties | Plaintiff: February 29, 2016; Defendant: March 14, 2016 |
| Amendment of Pleadings | March 28, 2016 |
| Experts and Experts' Written Reports | Plaintiff: April 1, 2016 Defendants: May 2, 2016 |
| Challenges to Expert Testimony | September 23, 2016 |
| Motions to Dismiss | February 26, 2016 |
| Motions for Summary Judgment | July 11, 2016 |

SO ORDERED.

Andrea K. Johnstone
 Andrea K. Johnstone
 United States Magistrate Judge

November 30, 2015

cc: Douglas Bersaw, Pro Se
 Robert A. McCall, Esq.